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**west virginia** department of environmental protection

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Office of Oil and Gas  
601 57th Street SE  
Charleston, WV 25304  
(304) 926-0450  
(304) 926-0452 fax

Earl Ray Tomblin, Governor  
Randy C. Huffman, Cabinet Secretary  
[www.dep.wv.gov](http://www.dep.wv.gov)

March 02, 2015

CABOT OIL & GAS CORPORATION  
FIVE PENN CENTER WEST, SUITE 401  
PITTSBURGH, PA 15276

Re: Underground Injection Control (UIC)  
Permit #UIC2D0151017

Dear Applicant:

Your application for the referenced Underground Injection Control (UIC) Permit has been reviewed and found to be complete. Please find enclosed a **draft UIC permit and a public notice** which are prescribed by Title 47, Series 13, Section 13.24 issued pursuant to WV Code Chapter 22, Article 11 and 12. You are required to have this notice published in its entirety, as a Class I legal advertisement in the CLAY COUNTY FREE PRESS on 3/10/2015.

Upon publication, you are required to send a copy of the certificate of publication to:

Office of Oil and Gas  
601 57th Street SE  
Charleston, WV 25304  
Attn: Thomas L Bass, Environmental Resource Program Manager

The cost of publication is also your responsibility.

If no comments are filed during the thirty (30) day commenting period for the public notice, a permit may be issued. If you have any questions, feel free to call me at (304) 926-0499 ext. 1653.

Sincerely,

Thomas L Bass  
Environmental Resource Program Manager

Enclosures as stated

## **PUBLIC NOTICE**

West Virginia Department of Environmental Protection  
Office of Oil and Gas  
601 57th Street SE  
Charleston, WV 25304  
Phone: (304) 926-0450  
Fax: (304) 926-0452

Re: UIC Permit Application  
UIC2D0151017

### **APPLICATION FOR STATE UNDERGROUND INJECTION CONTROL PERMIT**

Public Notice Number: UIC-2015-001

Paper:  
*CLAY COUNTY FREE PRESS*  
POST OFFICE BOX 180  
CLAY, WV 25043

The following applicant has applied for a State Underground Injection Control (UIC) Permit for this facility or activity:

Applicant:  
CABOT OIL & GAS CORPORATION  
FIVE PENN CENTER WEST, SUITE 401  
PITTSBURGH, PA 15276

Application Number: UIC2D0151017  
Business Conducted: Oil and/or natural gas production.

Location: On the waters of Right Fork, tributary of Sycamore Creek, in Pleasant District of Clay County. Approximate coordinates UTM Northing 4243323 and UTM Easting 485104

Activity: Renewal of an Underground Injection Control (UIC) Class 2D Permit for the subsurface disposal of Class 2 - oil and/or natural gas production fluids

The state of West Virginia will act on the above application in accordance with the West Virginia Legislative Rules, Title 47, Series 13, Section 13.24 issued pursuant to Chapter 22, Article 11&12.

Any interested person may submit written comments on the draft permit and may request a public hearing within 30 days of the date of publication. Such comments or requests should be addressed to:

Office of Oil and Gas  
601 57th Street SE  
Charleston, WV 25304  
Attn: UIC Program

Comments received within this period will be considered prior to acting on the permit application. Correspondence should include the name, address, and telephone number of the writer and a concise statement of the nature of the issues raised. A public hearing may be held if the Chief considers significant the degree of public interest raised on issues relevant to the draft permit.

Interested persons may contact the person identified above at (304) 926-0450 to obtain further information.

The application, draft permit, and any required fact sheet are on file and may be inspected, by appointment, or copies obtained, at a nominal cost, at the Office of Oil and Gas, 601 57th Street SE, Charleston, WV 25304, between 8:00 a.m. and 4:00 p.m. on business days.

DRAFT

**AUTHORIZATION TO OPERATE AN  
UNDERGROUND INJECTION CONTROL  
(UIC) INJECTION WELL  
PERMIT NUMBER # UIC 2D0151017**

In compliance with provisions of the West Virginia Code, Chapter 22, Article 6, Article 11 and Article 12, as well as Legislative Rules, Title 47, Series 13 and Series 58, Title 47, Series 55, and Title 35 Series 1 and Series 4.

**PERMITTEE**

|         |                                 |               |                       |
|---------|---------------------------------|---------------|-----------------------|
| NAME    | Cabot Oil & Gas Corporation     | FACILITY TYPE | <u>Brine Disposal</u> |
| ADDRESS | Five Penn Center West Suite 401 | WELL API #    | <u>47-015-01017</u>   |
| ADDRESS | Pittsburgh, PA 15276            | FIELD NAME    | NA                    |

is authorized by this permit to inject Class II fluids that are brought to the surface in connection with conventional oil or natural gas production and may be commingled with waste waters from gas plants which are an integral part of production operations, unless those waters are classified as a hazardous waste at the time of injection into the Big Injun formation in accordance with the conditions set forth herein. The permitted injection depth shall be 2041 feet to 2069 feet. The injection well is located in Clay County, Clay 7.5' Quadrangle. The coordinates for this injection well are:

UTM NAD 83 Northing 4243323.94 and UTM NAD 83 Easting 485104.92.

The maximum permitted wellhead injection pressure is established as 1000 psi.

All references to West Virginia Regulations are to those that are in effect on the date that this permit becomes effective.

Any person who holds a permit shall pay an annual permit fee in accordance with the provisions of Title 47 Series 9 section 7 of the Legislative Rule. The first annual permit fee shall be remitted to the Office of Oil and Gas one (1) calendar year from the date of permit issuance; subsequent annual permit fees shall be remitted on or before the anniversary date of the permit issuance. The annual permit fee for a Class II disposal well is twenty five dollars (\$25). The permit becomes void if the annual permit fee has not been paid within one hundred eighty (180) days of the due date. The Chief shall not reissue a permit until all annual permit fees due during prior terms of that permit have been paid in full.

Failure to pay the annual groundwater fee of \$75.00 for Class IID as required by the West Virginia Code, Chapter 22, Article 11 and/or Article 12, shall be cause for revocation of this permit. The annual permit fee is due on the anniversary date of permit issuance and shall be paid on the anniversary date of issuance of this permit.

Non-compliance with the terms of this permit shall be cause for revocation of Certification under the terms of Chapter 22, Article 12, and revocation of the permit under Chapter 22, Article 11 of the West Virginia Code.

This permit and its authorization to inject shall remain in effect for five (5) years from the date of issuance of the final permit provided all terms of the permit are met.

James Martin, Chief  
Office of Oil and Gas

## **PART I**

### **A. REAPPLICATION**

If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must submit an administratively complete application for a new permit at least one hundred and eighty (180) days before this permit expires.

### **B. IMMEDIATE REPORTING**

The permittee shall report any noncompliance which may endanger health or the environment immediately after becoming aware of the circumstances by using the WVDEP Emergency Spill line number, 1-800-642-3074. Written submission shall also be provided within five (5) days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, permittee shall provide the anticipated time it is expected to continue; and the steps taken or planned to be taken to reduce, eliminate, and prevent reoccurrence of the noncompliance.

### **C. RIGHT OF APPEAL**

Notice is hereby given of your right to appeal the terms and conditions of this permit by which you are aggrieved to the State Environmental Quality Board by filing a NOTICE OF APPEAL on the form prescribed by such Board for this purpose, with the Board, in accordance with the provisions of Chapter 22 Article 11, Section 21 of the code of West Virginia within thirty (30) days after the date of receipt of the above permit.

### **D. EFFECT OF PERMIT**

The permittee is allowed to engage in underground injection in accordance with the conditions of this permit based on an approved permit application. The underground injection activity authorized by this permit shall not allow or cause the movement of any fluid into any subsurface area other than that which is specified, described, and shown on maps included in the application and may not cause a violation of any primary drinking water regulation or any health-based limit promulgated under 40 CFR Chapter 1, Part 141, amended June 1991, of the Code of Federal Regulations, or of any water quality standard promulgated by the State Environmental Quality Board. Any underground injection activity not authorized in this permit is prohibited. Compliance with the terms of this permit does not constitute a defense to any action brought under Part C and the imminent and substantial endangerment provisions in Part D of the Safe Drinking Water Act (SDWA) or any other common or statutory law for any breach of any other applicable legal duty.

### **E. PERMIT ACTIONS**

1. This permit can be modified, revoked and reissued or terminated for cause specified in Chapter 22, Article 11 (hereafter §22-11), and Chapter 22 Article 12 (hereafter §22-12) of the West Virginia Code, and Title 47, Series 13 (hereafter 47 CSR 13) of the Legislative Rules. The filing of a request by the permittee for a permit modification, revocation and reissuance, suspension or revocation, or notification of planned changes or anticipated noncompliance, does not stay any permit condition.

2. Transfer of Permits.

This permit is not transferable to any person unless notice is first provided to the Office of Oil and Gas and the permittee complies with requirements of 47 CSR 13-13.17. The Office of Oil and Gas may require modification or revocation and reissuance of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under the Safe Drinking Water Act (SDWA).

**F. SEVERABILITY**

The provisions of this permit are severable, and if any condition of this permit or the permittee's application or any provision of this permit to any person or circumstance is held invalid, such invalidity shall not affect other provisions or applications of other provisions of the permit and the remainder of this permit shall not be affected.

**G. DURATION OF PERMIT**

This permit and the authorization to inject are issued for a period of five (5) years unless terminated under Part I Section H paragraph 11 of this permit. However, when through no fault of the permittee the West Virginia Department of Environmental Protection does not issue a new permit with an effective date on or before the expiration date of the previous permit and the permittee has submitted a timely administratively complete application as required in Part I section A of this permit, which is a complete application for a new permit, the expired permit shall continue to remain fully effective and enforceable.

**H. GENERAL REQUIREMENTS**

1. Duty to Comply. The permittee must comply with all conditions of this permit. Any permit noncompliance may constitute a violation and be grounds for enforcement action, permit suspension, revocation, reissuance, modification, or denial of a permit renewal application. (47 CSR 13-13.12.a) Copies of UIC Program regulations (§22-11) may be obtained from the West Virginia Legislature's Web Site <http://www.legis.state.wv.us/WVCODE/Code.cfm>, and (47 CSR 13) may be obtained from the West Virginia Secretary of State's Web Site at <http://www.sos.wv.gov/>.
2. Duty to Reapply. If the permittee wishes to continue activity regulated by this permit after the expiration date of this permit, the permittee must apply for a new permit as required in Part I section A of this permit as well as obtain a new permit.
3. Duty to Halt or Reduce Activity Not a Defense. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
4. Duty to Mitigate. The permittee shall take all reasonable steps to minimize or correct any adverse impact on health of persons or the environment resulting from noncompliance with this permit.
5. Proper Operation and Maintenance. The permittee shall at all times properly operate and maintain all facilities, systems of treatment and control, and related equipment which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, adequate security at the facility to prevent unauthorized access, adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of this permit.

6. **Duty to Provide Information.** The permittee shall furnish to the Chief within a reasonable time, any information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or revoking this permit, or to determine compliance with this permit. The permittee shall also furnish to the Chief, upon request, copies of records required to be kept by this permit. If the permittee becomes aware of any incomplete or incorrect information in the permit application or subsequent report(s), the permittee shall promptly submit information addressing these deficiencies to the Chief.
7. **Inspection and Entry.** The permittee shall allow the Chief, or an authorized representative, upon the presentation of credentials and other documents as may be required by law to:
  - a. Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
  - d. Sample or monitor, at reasonable times, for the purposes of assuring permit compliance for any substances or parameters at any location.
8. **Penalties.** Any person who violates a permit requirement is subject to civil penalties, criminal penalties, fines and other enforcement actions under §22-11 and §22-12.
9. **Signatory Requirements.** Only a duly authorized person may sign documents and reports associated with this permit.
  - a. All reports required by this permit and other information requested by the Chief shall be signed as follows:
    - (1) For a corporation, by a responsible corporate officer of at least the level of vice-president;
    - (2) For a partnership or sole proprietorship, by a general partner or the proprietor, respectively; or
    - (3) For a Municipality, State, Federal, or other public agency by either a principal executive or a ranking elected official.
  - b. A duly authorized representative of the official designated in paragraph a. above may also sign only if:
    - (1) The authorization is made in writing by a person described in paragraph a. above;
    - (2) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity, and;
    - (3) The written authorization is submitted to, and approved by, the Chief.

- c. If an authorization under paragraph (b) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of paragraph (b) of this section must be submitted to the Chief prior to or together with any reports, information or applications to be signed by an authorized representative.
  - d. Any person signing a document under paragraph (b) of this section shall make the following certification: (47 CSR 13-13.11.d) "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person(s) who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."
10. Property Rights. Issuance of this permit does not convey property rights or mineral rights of any sort or any exclusive privilege; nor does it authorize any injury to persons or property, any invasion of other private rights, any infringement of State or local law or regulations, or any exclusive privilege.
11. Permit Actions. This permit may be modified, revoked and reissued, suspended, or revoked for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, suspension or revocation, or notification of planned changes or anticipated noncompliance, does not stay any permit condition.
12. Confidentiality of Information.
- a. In accordance with 47 CSR 13-13.21, any information submitted to the State pursuant to this rule may be claimed as confidential by the submitter. Any such claim must be asserted at the time of submission in the manner prescribed on the application form or instructions, or in the case of other submissions, by stamping the words "CONFIDENTIAL BUSINESS INFORMATION" on each page containing such information. If no claim is made at the time of submission, the State may make the information available to the public without further notice.
  - b. Claims of confidentiality for the following information will be denied:
    - i. The name and address of any permit applicant or permittee.
    - ii. Information which deals with the existence, absence, or level of contaminants in drinking water.
13. Monitoring Reports. Monitoring results shall be reported at the intervals specified elsewhere in this permit.
14. Compliance schedules. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than thirty (30) days following each schedule date.
15. Other information. Where a permittee becomes aware that he/she failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Chief, he/she shall promptly submit such facts or information.

16. State or Federal Laws. Nothing in this permit shall be construed to preclude the institution on any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any State or Federal law or regulation.

## **PART II**

### **A. RECORD RETENTION**

1. Required Records. The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least three (3) years from the date of the sample, measurement, report or application. This period may be extended by request of the Chief at any time.
2. Disposal of Records. The permittee shall retain records in accordance with 47 CSR 13.12.j.2.

### **B. MONITORING REQUIREMENTS**

1. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the fluid to be analyzed and the procedure for analysis of the sample shall be in accordance with test procedures approved under 40 CFR 136.3, unless otherwise approved by the Chief. The permittee shall identify the types of tests and methods used to generate the monitoring data.
2. All environmental measurements required by the permit, including but not limited to, measurements of pressure, temperature, mechanical, and chemical analyses shall be done in accordance with state guidance on quality assurance. All analysis must be performed by a West Virginia certified laboratory.
3. Records of monitoring information shall include:
  - a. The date, exact place, and time of sampling or measurements;
  - b. The individual(s) who performed the sampling or measurements;
  - c. The date(s) analysis(es) were performed;
  - d. Individual(s) who performed the analyses;
  - e. The analytical techniques or methods used; and
  - f. The results of such analyses.
4. The permittee shall monitor all the casing annuli with pressure sensitive devices or with such a method as approved or required by the Office of Oil and Gas to allow early detection of any leaks from the injection zone or casing. The Permittee shall also monitor injection pressure, volume, and rate daily. This information shall be reported monthly using the Office of Oil and Gas electronic WR-40 Form. Submittal shall be through the current WVDEP Electronic Submittal System (ESS).
5. The permittee shall sample, analyze and record the nature of all the injected fluid for the parameters listed in TABLE 1 below at the initiation of the injection operation and upon request by the Chief or whenever the operator observes or anticipates a change in the injection fluid.

**TABLE 1**

|                       |                             |
|-----------------------|-----------------------------|
| -pH                   | -Manganese                  |
| -Specific Gravity     | -Total Dissolved Solids     |
| -Barium               | -Hydrogen Sulfide           |
| -Specific Conductance | -Sodium                     |
| -Iron                 | -Alkalinity                 |
| -Magnesium            | -Hardness                   |
| -Chloride             | -Total Organic Carbon (TOC) |
| -Dissolved Oxygen     |                             |

6. Any analysis of specific gravity greater than 1.2 and any analysis of TOC greater than 250.0 mg/L shall be reported to the Chief within twenty-four (24) hours of the results.
7. The permittee shall maintain a record (manifest) of every load of fluid received. The record shall include the hauler's name and signature, the operator's name and signature, API number for the well the fluid was collected or the location from where the load was obtained, the volume of the load and whether the load of fluid delivered was a split load. If the load was a split load, each operator's name and location shall be listed and, if possible, the volumes of fluid received from each operator documented. This information shall be maintained on the Class II disposal manifest attached to this permit and maintained at the facility.
8. A wellhead pressure gauge shall be installed and maintained on the injection tubing to facilitate inspection and ensure compliance of maximum injection pressures as approved on Oil and Gas Form WR-37. A daily reading of the injection pressure shall be taken and reported electronically on Form WR-40.
9. All pipeline(s) associated with the approved injection activity shall be tested for integrity at least once every five (5) years and the results reported on Form WR-37 to the Office of Oil and Gas.
10. The permittee shall conduct a mechanical integrity test at a minimum frequency of once every five (5) years per 35 CSR 4-7.7.b. The permittee shall notify the Chief of his or her intent to conduct a mechanical integrity test within twenty-four (24) hours prior to such demonstration. The permittee must submit a WR-37 Form with each mechanical integrity test along with a copy of any test chart(s). Upon failure of a mechanical integrity test or expiration of the five (5) year mechanical integrity test regulatory period, the permittee shall cease operation/injection and shut-in the well immediately until successfully repaired, tested or permanently plugged and abandoned per regulation. Corrective action for repairs shall be completed and approved by the Office of Oil and Gas and be conducted within ninety (90) days of the failure date. If repaired, the well must be re-tested and an updated WR-37 Form must be submitted to the Office of Oil and Gas for approval.
11. In addition to the above requirement, a mechanical integrity test demonstration shall be conducted whenever protective casing or tubing is removed from the well, the packer is replaced or resealed, or a well failure is evident. The permittee may continue operation only if he or she has successfully demonstrated to the Chief the mechanical integrity of the permitted well. The permittee shall cease injection operations if a loss of mechanical integrity becomes evident or if mechanical integrity cannot be demonstrated.
12. Failure to meet the specified terms of this permit, are grounds for revocation of this permit by the Office of Oil and Gas.

## C. REPORTING AND NOTIFICATION REQUIREMENTS

1. Anticipated Noncompliance. The permittee shall give advance notice to the Chief of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.
2. Other Noncompliance. The permittee shall report all instances of noncompliance not reported under paragraphs Part I Section B, and Part II Section C Paragraph 3 of this permit, at the time monitoring reports are submitted. The report shall contain the information listed in Part I Section B of this permit. The permittee shall report all other instances of noncompliance in writing within ten (10) days of the time the permittee becomes aware of the circumstances. The reports shall contain the information listed in this permit.
3. Planned Changes. The permittee shall give notice to the Chief as soon as possible of any planned significant physical alterations, additions to the permitted facility, and/or any significant changes planned in the operation of the facility.
4. Cessation of Injection Activity. Any well which is not in use for a period of twelve (12) consecutive months shall be presumed to have been abandoned and shall promptly be plugged by the operator in accordance with the provisions in Chapter 22, Article 6 Section 24 of the West Virginia Code, unless the operator furnishes satisfactory proof to the Chief that there is a bona fide future use for such well.
5. Report on Permit Review. Within thirty (30) days of receipt of this permit, the permittee shall report to the Chief that he or she has read and understands and accepts all terms and conditions of the permit.
6. Twenty-four (24) Hour Reporting.
  - a. The permittee shall report to the Chief any noncompliance which may endanger human health or the environment. Such report shall be provided orally (phone number 1-304-926-0450 or 1-800-642-3074) within twenty-four (24) hours from the time the permittee becomes aware of the circumstance. The following shall be included as information which must be reported orally within 24 hours:
    - i. Any monitoring or other information which indicates that any contaminant may cause an endangerment to an underground source of drinking water (USDWs).
    - ii. Any non-compliance with a permit condition or malfunction of the injection system which may cause fluid migration into or between the USDWs, or failure of mechanical integrity test demonstrations.
  - b. A written submission shall also be provided within five (5) days of the time the permittee becomes aware of the circumstances. Written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.

## **PART III**

### **A. OPERATING REQUIREMENTS**

1. Injection Fluid. The permittee shall not inject any hazardous substances, as defined by 40 CFR 261, or any other fluid, other than the fluids produced solely in association with oil and gas production operations.
2. Any production well within the permitted Area of Review of this disposal well which does not have cemented casing through the injection zone(s) shall be plugged immediately upon becoming inactive. Any temporary inactive well shall be monitored at a frequency and by a method prescribed by the Office of Oil and Gas upon notice by the permittee of such activity. Any well shut-in more than one (1) year shall be considered abandoned.
3. Injection between the outermost casing protecting underground sources of drinking water and the wellbore is prohibited, as is injection into any USDW.
4. Corrective Action. The applicant must satisfy the requirement of the Office of Oil and Gas regarding any corrective action needed on all known wells penetrating the injection zone within the area of review. This must be done in a manner which satisfies the requirements of 47 CSR 13-13.9.
5. Any production well within the Area of Review which does not have the cemented casing through the injection zone(s) shall be plugged immediately upon becoming inactive. Any temporary inactive well shall be monitored at a frequency and by a method prescribed by the Office of Oil and Gas upon notice by the permittee of such activity. Any well shut-in more than one (1) week shall be considered inactive.
6. Loading and unloading stations shall have spill prevention and control facilities and procedures as well as secondary containment. Spill containment and cleanup equipment shall be readily accessible.
7. No third party haulers shall be permitted without approval by the Office of Oil and Gas. For approval, the permittee shall designate by letter to the Office of Oil and Gas, any third party hauler proposed to be used for the transportation of fluids to the facility. The third party hauler may not commence transportation of fluids to the facility until approved by the Office of Oil and Gas.
8. Facility Security. The gate on the access road to the site shall be closed and locked at all times when there is not a company representative at the facility. All visitors must check in upon arriving at the facility. Haulers (trucks) shall not be allowed to off load without the proper paperwork and documentation.

### **B. PLUGGING AND ABANDONMENT**

1. Any well which is not in use for a period of twelve (12) consecutive months shall be presumed to have been abandoned and shall promptly be plugged by the operator in accordance with the provisions of Chapter 22, Article 6, of the West Virginia Code, unless the operator furnishes satisfactory proof to the Chief that there is a bona fide future use for such well.
2. Prior to well plugging, the permittee shall apply for and receive a plugging permit from the Office of Oil and Gas to plug and abandon the well in accordance with an approved plugging and abandonment plan.

3. Plugging and abandonment shall be conducted in a manner to prevent movement of fluids into or between underground sources of drinking water.

#### **PART IV**

##### **A. SITE SPECIFIC CONDITIONS**

1. Appendix A: Specific operational conditions.
2. Appendix H: Groundwater Protection Plan (GPP) The GPP shall be maintained and updated as necessary to protect groundwater quality.

DRAFT

## APPENDIX A

### Injection Well Form

|  |                   |  |                                    |
|--|-------------------|--|------------------------------------|
| <b>1) GEOLOGIC TARGET FORMATION</b> <u>Big Injun Sandstone</u>   |                   |  |                                    |
| Depth  | <u>2,041</u>      | Feet (top)                                     | <u>2,069</u> Feet (bottom)         |
| <b>2) Estimated Depth of Completed Well, (or actual depth of existing well):</b>   |                   | <u>2,130</u>                                   | Feet                               |
| <b>3) Approximate water strata depths:</b>   |                   | Fresh <u>N/A</u> Feet                          | Salt <u>N/A</u> Feet               |
| <b>4) Approximate coal seam depths:</b>  |                   | <u>N/A</u>                                     |                                    |
| <b>5) Is coal being mined in the area?</b> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>   |                   |  |                                    |
| <b>6) Virgin reservoir pressure in target formation</b>  |                   | <u>550</u> psig                                | Source <u>COGC Geology Records</u> |
| <b>7) Estimated reservoir fracture pressure</b>  |                   | <u>2,100 (1200 psig @ surface)</u> psig (BHFP) |                                    |
| <b>8) MAXIMUM PROPOSED INJECTION OPERATIONS:</b>   |                   |  |                                    |
| Injection rate (bbl/hour)  | <u>40</u>         |  |                                    |
| Injection volume (bbl/day)   | <u>960</u>        |  |                                    |
| Injection pressure (psig)  | <u>1,000 psig</u> |  |                                    |
| Bottom hole pressure (psig)  | <u>1,930 psig</u> |  |                                    |
| <b>9) DETAILED IDENTIFICATION OF MATERIALS TO BE INJECTED, INCLUDING ADDITIVES:</b>  |                   |  |                                    |
| Produced fluids, pipeline fluid. 15% HCL acid may be used periodically to clean formation and perforations to re-establish injection rates. Biocides and other additives are not routinely used but could be used occasionally |                   |  |                                    |
| Temperature of injected fluid: (°F)  |                   | <u>Ambient</u>                                 |                                    |
| <b>10) FILTERS (IF ANY)</b>  |                   |  |                                    |
| <u>5 Micron</u>  |                   |  |                                    |
| <b>11) SPECIFICATIONS FOR CATHODIC PROTECTION AND OTHER CORROSION CONTROL</b>  |                   |  |                                    |
| <u>Monitor Annular Fluid Volume</u>  |                   |  |                                    |

## APPENDIX A (cont.)

### 12. Casing and Tubing Program

| TYPE           | Size   | New or Used | Grade | Weight per ft. (lb/ft) | FOOTAGE: For Drilling | INTERVALS: Left in Well | CEMENT: Fill-up (Cu. Ft.) |
|----------------|--------|-------------|-------|------------------------|-----------------------|-------------------------|---------------------------|
| Conductor      |        |             |       |                        |                       |                         |                           |
| Fresh Water    | 8 5/8" |             |       |                        | 139'                  | 139'                    | CTS                       |
| Coal           |        |             |       |                        |                       |                         |                           |
| Intermediate 1 |        |             |       |                        |                       |                         |                           |
| Intermediate 2 |        |             |       |                        |                       |                         |                           |
| Production     | 4 1/2" |             | J55   | 10.5                   | 2124'                 | 2124'                   | 1826'                     |
| Tubing         | 2 3/8" |             | J55   | 4.7                    |                       | 2036'                   | On Packer                 |
| Liners         |        |             |       |                        |                       |                         |                           |

| TYPE           | Wellbore Diameter | Casing Size | Wall Thickness | Burst Pressure | Cement Type | Cement Yield (cu. ft./sk) | Cement to Surface ? (Y or N) |
|----------------|-------------------|-------------|----------------|----------------|-------------|---------------------------|------------------------------|
| Conductor      |                   |             |                |                |             |                           |                              |
| Fresh Water    |                   |             |                |                |             |                           |                              |
| Coal           |                   |             |                |                |             |                           |                              |
| Intermediate 1 |                   |             |                |                |             |                           |                              |
| Intermediate 2 |                   |             |                |                |             |                           |                              |
| Production     |                   |             |                |                |             |                           |                              |
| Tubing         |                   |             |                |                |             |                           |                              |
| Liners         |                   |             |                |                |             |                           |                              |

| PACKERS     | Packer #1       | Packer #2 | Packer #3 | Packer #4 |
|-------------|-----------------|-----------|-----------|-----------|
| Kind:       | Baker AD-1      |           |           |           |
| Sizes:      | 2 3/8" x 4 1/2" |           |           |           |
| Depths Set: | 2024' - 2027'   |           |           |           |

## APPENDIX H

### GROUNDWATER PROTECTION PLAN

Facility Name: Caldwell #2

County: Clay County

**Facility Location:**

|                         |                         |  |
|-------------------------|-------------------------|--|
| Postal Service Address: |                         |  |
| Latitude and Longitude: | 38.337991°, -81.170507° |  |

**Contact Information:**

|                 |                             |
|-----------------|-----------------------------|
| Person:         | Whitney Johnson             |
| Phone Number:   | (304) 595-5015              |
| E-mail Address: | whitney.johnson@cabotog.com |

Date: 6/5/2014

1. A list of all operations that may contaminate the groundwater.

- (2) 8,820 gallon Steel Storage Tanks containing recovered oil
- (2) 8,820 gallon Steel Storage Tanks containing recovered brine water
- (1) 4,200 Gallon Fiberglass Storage Tank
- transferring the produced fluids into tanker trucks
- pipelines carrying the recovered and re-injected fluids

2. A description of procedures and facilities used to protect groundwater quality from the list of potential contaminant sources above.

The storage tanks are all located on a cement pad and located in secondary containment. These tanks undergo visual inspection and pressure valve checks. The transferring of the produced fluids into the tanker trucks occurs on a sloped loadout pad that is bermed and contains a sump at the sloped end for the collection of any spills that occur during transfer. The pipelines carrying the fluids from the wellhead to the tanks and out to the trucks undergo visual inspection, pressure valve checks and have emergency shut-off valves.

3. List procedures to be used when designing and adding new equipment or operations.

There are no current plans to modify the facility. If new equipment is added to the facility, drawings and plans are constructed to protect groundwater. The plans will be submitted for approval to the list below before construction at the facility may begin:

- Review and stamped by a Professional Engineer or Geologist
- Review and approved by the Environmental Safety Committee.
- Review and approved by the EHS Manager.

4. Summarize all activities at your facility that are already regulated for groundwater protection.

Currently the facility has a Spill Prevention, Control and Countermeasure Plan (SPCC Plan) that is maintained, updated and in compliance with the EPA SPCC Rules. The facility is part of the Underground Injection Control (UIC) Program and is in the process of completing the UIC permit application.

5. Discuss any existing groundwater quality data for your facility or an adjacent property.

Currently the groundwater is not monitored at the site, and no data is available for this facility. The Clay PSD supplies water to the area residences although several residences have maintained their private wells. It was reported by the Clay County Sanitarian, Heath Oliver, that most residences located in the mile radius of the well have hand dug wells with an average depth to water around 15 feet. He stated that no new wells have been drilled since 2003. Water from nearby wells has been sampled and the results of these analyses are attached.

6. Provide a statement that no waste material will be used for deicing or fill material on the property unless allowed by another rule.

No material waste generated at the site is used for deicing or fill.

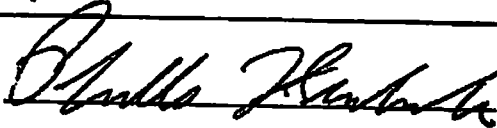
7. Describe the groundwater protection instruction and training to be provided to the employees. Job procedures shall provide direction on how to prevent groundwater contamination.

All employees are trained and instructed in groundwater protection. The staff is required to read and review the GPP and sign a statement stating they acknowledge their role in protecting the groundwater from on-site contaminants. The staff receives yearly training teaching them specific prevention measures and cleanup procedures and to recognizing potential groundwater contaminants. They are taught to respond to spills and notify personnel as well as document any issues. They are informed that part of their duty is the protection of groundwater, a resource which, by law, must be protected.

8. Include provisions for inspections of all GPP elements and equipment. Inspections must be made quarterly at a minimum.

Quarterly inspections are performed by facility personnel to ensure that all elements and equipment of the site's groundwater protection program are in place, properly functioning and appropriately managed. All steel tanks and pipelines are visually inspected for signs of water, debris, or fire hazard and free of visible signs of leakage. The tank exterior and pipeline exterior is checked for signs of weathering or damage or leaks. All valves are checked to make sure they are operable, in a closed position, not leaking and locked. All liquid level gauges are verified to be readable and in good condition. Secondary containment is checked to be in good condition and drained.

Signature:



Date:

June 6, 2014

## Class II Manifest

UIC # \_\_\_\_\_

**\*I hereby certify that the contents of this shipment are Class II fluids that were brought to the surface in connection with oil or natural gas production.**

[illegible]

**Make as many copies of the document as necessary to comply with the UIC permit.  
Page numbers should be maintained sequentially to provide an adequate record.**

WR-40 B

STATE OF WEST VIRGINIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
REPORT FOR WASTE DISPOSAL WELLS

MONTH /YEAR (MM/YYYY): \_\_\_\_\_  
WELL NO. \_\_\_\_\_  
API NO. 47- - \_\_\_\_\_  
PERMIT NO. \_\_\_\_\_

OPERATOR NAME: \_\_\_\_\_

\*\*\*\*\*MAXIMUM PERMITTED INJECTION PRESSURE \_\_\_\_\_ PSIG.\*\*\*\*\*

| DAY    | OPERATING HOURS | ANNULUS PRESSURES (PSIG) |       | MAXIMUM DAILY INJECTION PRESSURE (PSIG) | SHUT IN PRESSURE (PSIG) | VOLUME IN BBLs AND/OR MCF. |             | RATE IN GALLONS PER MINUTE |         |
|--------|-----------------|--------------------------|-------|---|-------------------------|----------------------------|-------------|----------------------------|---------|
|        |                 | TUBING                   | OTHER |   |                         | DAILY                      | ACCUMULATED | MAXIMUM                    | MINIMUM |
| 1      |                 |                          |       |   |                         |                            | 0           |                            |         |
| 2      |                 |                          |       |   |                         |                            | 0           |                            |         |
| 3      |                 |                          |       |   |                         |                            | 0           |                            |         |
| 4      |                 |                          |       |   |                         |                            | 0           |                            |         |
| 5      |                 |                          |       |   |                         |                            | 0           |                            |         |
| 6      |                 |                          |       |   |                         |                            | 0           |                            |         |
| 7      |                 |                          |       |   |                         |                            | 0           |                            |         |
| 8      |                 |                          |       |   |                         |                            | 0           |                            |         |
| 9      |                 |                          |       |   |                         |                            | 0           |                            |         |
| 10     |                 |                          |       |   |                         |                            | 0           |                            |         |
| 11     |                 |                          |       |   |                         |                            | 0           |                            |         |
| 12     |                 |                          |       |   |                         |                            | 0           |                            |         |
| 13     |                 |                          |       |   |                         |                            | 0           |                            |         |
| 14     |                 |                          |       |   |                         |                            | 0           |                            |         |
| 15     |                 |                          |       |   |                         |                            | 0           |                            |         |
| 16     |                 |                          |       |   |                         |                            | 0           |                            |         |
| 17     |                 |                          |       |   |                         |                            | 0           |                            |         |
| 18     |                 |                          |       |   |                         |                            | 0           |                            |         |
| 19     |                 |                          |       |   |                         |                            | 0           |                            |         |
| 20     |                 |                          |       |   |                         |                            | 0           |                            |         |
| 21     |                 |                          |       |   |                         |                            | 0           |                            |         |
| 22     |                 |                          |       |   |                         |                            | 0           |                            |         |
| 23     |                 |                          |       |   |                         |                            | 0           |                            |         |
| 24     |                 |                          |       |   |                         |                            | 0           |                            |         |
| 25     |                 |                          |       |   |                         |                            | 0           |                            |         |
| 26     |                 |                          |       |   |                         |                            | 0           |                            |         |
| 27     |                 |                          |       |   |                         |                            | 0           |                            |         |
| 28     |                 |                          |       |   |                         |                            | 0           |                            |         |
| 29     |                 |                          |       |   |                         |                            | 0           |                            |         |
| 30     |                 |                          |       |   |                         |                            | 0           |                            |         |
| 31     |                 |                          |       |   |                         |                            | 0           |                            |         |
| TOTALS | 0               | 0                        | 0     | 0                                       | 0                       | 0                          | 0           | 0                          | 0       |

I HEREBY CERTIFY THAT THE INFORMATION ON THIS REPORT IS TRUE AND CORRECT.

BY: \_\_\_\_\_  
TITLE: \_\_\_\_\_